

ADRIAN J. SAWYER (203712)
sawyer@kerrwagstaffe.com
KERR & WAGSTAFFE LLP
101 Mission Street, 18th Floor
San Francisco, CA 94105-1727
Telephone: (415) 371-8500
Fax: (415) 371-0500

Attorneys for Non-Parties
SANDSTONE GROUP, LLC,
TYTO LIDAR, LLC, and
OGNEN STOJANOVSKI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING LLC

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ADRIAN J. SAWYER
IN SUPPORT OF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS MOTION TO
COMPEL DEPOSITIONS, OVERRULE
OBJECTIONS, COMPEL
INTERROGATORIES, AND COMPEL
SUPPLEMENTAL 30(B)(6) WITNESS
(DKT. 1789)**

1 I, Adrian J. Sawyer, hereby declare as follows:

2 1. I am an attorney licensed to practice before all courts of the State of California. I
3 am a partner in the law firm of Kerr & Wagstaffe LLP, attorneys for non-parties Sandstone
4 Group, LLC, Tyto LiDAR, LLC, and Ognen Stojanovski. I have personal knowledge of the
5 matters stated herein and if called upon would testify competently thereto.

6 2. I make this declaration in support of Plaintiff Waymo LLC's Administrative
7 Motion to File Under Seal Its Motion to Compel Depositions, Overrule Objections, Compel
8 Interrogatories, and Compel Supplemental 30(B)(6) Witness (Dkt. 1789). I have reviewed the
9 Administrative Motion to File Under Seal (the "Administrative Motion"), together with
10 Waymo's Motion to Compel Depositions, Overrule Objections, Compel Interrogatories, and
11 Compel Supplemental 30(B)(6) Witness ("Motion to Compel") (Dkt. 1789-10), and the exhibit
12 to the Motion to Compel sought to be filed under seal.

13 3. Tyto LiDAR is a non-party and are existing limited liability company. All of the
14 information designated by Tyto LiDAR and included in the Motion to Compel was designated
15 confidential. None of the information was designated highly confidential/AEO by Tyto LiDAR.

16 4. Exhibit 20 to the Motion to Compel is a Secondment Agreement between
17 Dogwood Leasing, LLC and Odin Wave, LLC, subsequently known as Tyto LiDAR. Exhibit 20
18 contains confidential proprietary and operational information of Tyto LiDAR, including
19 information related to development of its prototype LiDAR sensor and its management policies.
20 Because Tyto LiDAR is a non-party and existing private company, it requests that its
21 confidentiality interests in this information be respected in this proceeding.

22 5. Waymo's request to seal is narrowly tailored to those exhibits to Waymo's
23 Response that merit sealing.

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct. Executed this 28th day of September, 2017 at San Francisco,
26 California.

27 /s/ Adrian J. Sawyer
28 ADRIAN J. SAWYER